

**GOLDFARB & HUCK
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925 Fourth Avenue, Suite 3950
Seattle, WA 98104

July 29, 2019

Via Certified Mail

Stephanie Croll, Sr. Assistant City Attorney
Kirk Triplett, City Manager
City of Kirkland
123 Fifth Avenue
Kirkland, WA 98033

RECEIVED ON:

ORC

JUL 31 2019

no CMS
EPA Region 10
Office of the Regional Administrator

Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT

Dear Ms. Croll and Mr. Triplett:

We are counsel for Kirk and Carol Mathewson, Thatcher Mathewson, ANV, LLC, Celane, LLC and Tapps, LLC (collectively, "Property Owners"). Property Owners are the owners of certain real properties situated in Kirkland, Washington (the "Properties"). Attached as **Exhibit A** is a list of Property Owners' contact information and their respective Properties owned. The contact information for the undersigned counsel is:

Kit W. Roth
Goldfarb & Huck Roth Riojas, PLLC
925 Fourth Avenue
Suite 3950
Seattle, Washington 98104
(206) 452-0260

Pursuant to 33 U.S.C. § 1365(b) and 40 CFR § 135.1 *et seq*, this letter provides formal notice that, no earlier than 60 days after the date of this notice, and unless the Environmental Protection Agency and/or the State of Washington commences and diligently prosecutes an enforcement action with respect to the violations described in this letter, Property Owners intend to commence a citizen suit under the Clean Water Act (the "CWA"), 33 U.S.C. § 1365(a)(1) (the "Prospective Action") against the City of Kirkland ("Kirkland").

The Prospective Action concerns contamination of a water channel situated within Kirkland, which abuts the Properties and ultimately discharges into Lake Washington (the "Channel"). Certain of Kirkland's documents refer to the Channel as "Houghton Creek," "Lakeview Creek," or similar

designations. The Channel is a “water of the United States,” including by virtue of being a tributary of Lake Washington. *See* 33 U.S.C. § 1362(7), 33 C.F.R. § 328.3; 40 C.F.R. § 122.2.

The source of the subject contamination is a stormwater collection and discharge system that Kirkland operates within its boundaries, under a Phase II Municipal Stormwater Permit (the “Phase II Permit”) developed and administered by the Washington Department of Ecology (“Ecology”) pursuant to the CWA National Pollution Discharge Elimination System (“NPDES”). *See generally* 33 U.S.C. § 1342; RCW 90.48.260; WAC Chapter 173-220. It is a violation of, *inter alia*, Sections 301(a) and 402 of the CWA (33 U.S.C. §§ 1311(a) and 1342) for Kirkland to discharge stormwater into the waters of the United States, other than in conformity with its Phase II Permit.

Kirkland’s Phase II Permit prohibits, *inter alia*, “the discharge of toxicants to waters of the state of Washington which would violate any water quality standard, including toxicant standards, sediment criteria, and dilution zone criteria” and “a discharge which would be a violation of Washington State Surface Water Quality Standards (chapter 173-201A WAC), Ground Water Quality Standards (chapter 173-200 WAC), Sediment Management Standards (chapter 173-204 WAC), or human health-based criteria in the national Toxics Rule (Federal Register, Vol. 57, NO. 246, Dec. 22, 1992, pages 60848-60923).”

Kirkland’s stormwater collection and discharge system collects stormwater from portions of the subject drainage basin (referred to by Kirkland as the “Houghton Slope A basin”) and directs that stormwater into the Channel at various point sources. Attached as **Exhibit B** is a map produced by Kirkland, depicting the drainage area discharged into the Channel. Attached as **Exhibit C** are additional maps produced by Kirkland, depicting many of the relevant portions of Kirkland’s stormwater system and many of its various connections into the Channel. Each such connection is a “point source” for purposes of the CWA.

The stormwater entering the Channel from Kirkland’s stormwater collection and discharge system collects and carries various pollutants, contaminants, toxicants, and/or other harmful substances. Such substances include, without limitation: fecal coliform bacteria and human and/or animal waste; excessive nutrients such as nitrogen and/or phosphorus; petroleum and other chemical products; and/or metals such as copper and zinc. A portion of the contamination present in the Channel is believed to originate on property owned and/or operated by Kirkland, such as streets, sidewalks, and parks.

Pursuant to, *inter alia*, its Phase II Permit, Kirkland is obligated to prevent the discharge of contaminants, including into the Channel and onto the Properties. Kirkland has failed to take reasonable steps to prevent and/or mitigate the discharge of such contaminants into the Channel and onto the Properties by Kirkland’s stormwater collection and discharge system. On the contrary, Kirkland actively causes the discharge of contaminants into the Channel, onto the Properties, and eventually into Lake Washington through the stormwater collection and discharge system that it operates.

In addition, Kirkland’s collection and discharge of higher and higher volumes of water into the Channel over time has increased both the volume and velocity of the Channel in the vicinity of the

Properties. This has led to increased erosion, which in turn has increased sediment loading and turbidity in the Channel. Making matters worse, substantially all of the Channel located upstream from the Properties is enclosed in underground culverts and similar structures. Kirkland's use of underground culverts in its stormwater collection and discharge system upstream of the Properties has exacerbated the excessive volume and velocity of water, and associated erosion and turbidity, in the Channel in the vicinity of the Properties.

The Channel routinely exhibits indicia of contamination, such as a turbid appearance and foul odor. Accordingly, on September 1, 2016, at the request of Property Owners, Raedeke Associates, Inc. ("Raedeke Associates") tested the Channel in the vicinity of the Properties, and identified multiple violations of water quality standards, including levels of fecal coliform bacteria *thousands of times* higher than limits imposed by Ecology regulations incorporated into Kirkland's Phase II permit. After Property Owners advised Kirkland of the test results, Kirkland conducted its own testing of the Channel, which confirmed levels of fecal coliform "above State Water Quality Standards." *See Exhibit D.* Kirkland posited that the major source of the contamination was "the collection of sources such as geese, rodents and pets that deposit fecal matter which is washed into the stormwater system and subsequently into streams during rain events." *Id.*

The following table identifies certain quantitative standards, limitations, and orders that Property Owners allege Kirkland has violated, including measurements showing such violations.¹ Unless otherwise noted, testing was performed by Raedeke Associates on September 1, 2016.

Parameter	Standard	Result (Property Owners)
Fecal coliform	Former: 50 cfu (average); 100 cfu (90 th percentile) ² Current: 100 cfu (average); 200 cfu (90 th percentile)	Raedeke Associates Testing: 200,000 – 240,000 cfu Kirkland Testing: Up to 1,400 cfu; measurements exceeded 100 cfu on 3 of 4 days sampled. (<i>See Exhibit D.</i>)
<i>E. coli</i>	100 cfu (average); 320 cfu (90 th percentile) ³	Kirkland Testing: Up to 1,300 cfu; measurements exceeded 100 cfu on 2 of 3 days sampled. (<i>See Exhibit D.</i>)

¹ The standards reported in the table are based on Property Owners' present understanding of the properties and classification of the Channel. Property Owners reserve the right to rely on additional standards to the extent applicable.

² WAC 173-201A-200. Revised to 100/200 cfu as of February 2019. *See* WSR 19-04-007.

³ WAC 173-201A-200.

pH	No less than 6.5 ⁴	6.3 – 6.5
Total Suspended Solids	Narrative – see below ⁵	18 – 240 mg/L
Turbidity	5 NTU or 10% above background ⁶	18 – 99 NTU
Nitrate + Nitrite	Narrative – see below ⁷	1.4 – 1.5 mg/L
Sol-Reactive Phosphorus	<i>Id.</i>	0.15 – 0.17 mg/L
Total Phosphorus	<i>Id.</i>	0.34 – 1.13 mg/L
Copper (Total)	See below re: dissolved fraction	20.5 – 60.4 µg/L
Zinc (Total)	See below re: dissolved fraction	89.3 – 453 µg/L
Copper (Dissolved)	11.2 to 12.3 µg/L (state) ⁸ 17 µg/L (EPA, maximum) 11 µg/L (EPA, continuous) ⁹	13.4 – 15.9 µg/L
Zinc (Dissolved)	78.4-85.6 µg/L (state) ¹⁰ 110 µg/L (EPA, maximum) 100 µg/L (EPA, continuous) ¹¹	45.6 – 88.5 µg/L

In addition, Kirkland has violated at least the following narrative or qualitative standards imposed by its Phase II permit:

⁴ WAC 173-201A-200. “Core Summer Salmonid Habitat” as the Channel is a tributary of the Lake Washington Ship Canal habitat area. *See* WAC 173-201A-600; -602.

⁵ Phase II permit at p. 38.

⁶ WAC 173-201A-200.

⁷ WAC 173-201A-230.

⁸ WAC 173-201A-240. Limit dependent on water hardness; Raedeke Associates measured hardness of 64-71 mg / L (CaCO₃).

⁹ 40 C.F.R. § 131.36(b).

¹⁰ WAC 173-201A-240. Limit dependent on water hardness; Raedeke Associates measured hardness of 64-71 mg / L (CaCO₃).

¹¹ 40 C.F.R. § 131.36(b).

- Phase II Permit, § S4.C (“The Permittee shall reduce the discharge of pollutants to the maximum extent practicable (MEP).”).
- Phase II Permit, § S4.D (“The Permittee shall use all known, available, and reasonable methods of prevention, control and treatment (AKART) to prevent and control pollution of waters of the state of Washington.”).
- Phase II Permit, § G2 (“The Permittee shall at all times properly operate and maintain all facilities and systems of collection, treatment, and control (and related appurtenances) which are installed or used by the Permittee for pollution control to achieve compliance with the terms and conditions of this Permit.”).
- Phase II Permit, § G6 (“The Permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this Permit which has a reasonable likelihood of adversely affecting human health or the environment.”).
- WAC 173-201A-260(2)(a) (“Toxic, radioactive, or deleterious material concentrations must be below those which have the potential, either singularly or cumulatively, to adversely affect characteristic water uses, cause acute or chronic conditions to the most sensitive biota dependent upon those waters, or adversely affect public health.”).
- WAC 173-201A-260(2)(b) (“Aesthetic values must not be impaired by the presence of materials or their effects, excluding those of natural origin, which offend the senses of sight, smell, touch, or taste”).
- WAC 173-204-340 (Ecology shall determine freshwater sediment quality standards on a case-by-case basis. The Channel is believed to carry sediment in excess of what Ecology would deem acceptable.).
- WAC 173-204-400(2) (“Permits and other authorizations of wastewater, stormwater, and nonpoint source discharges to surface waters of the state of Washington under authority of chapter 90.48 RCW shall be conditioned so that the discharge receives all known, available and reasonable methods of [sediment] prevention, control, and treatment, and best management practices prior to discharge, as required by chapters 90.48, 90.52, and 90.54 RCW.”).

As described above, the “location of the alleged violation” (40 C.F.R. § 135.3) is the course of the Channel, from each outfall or other connection with Kirkland’s stormwater system to the Channel’s discharge into Lake Washington; and in particular those portions of the Channel abutting the Properties.

The violation has been ongoing since at least September 1, 2016, when it was documented by Raedeke Associates’ testing and Kirkland’s subsequent testing, and continues through the present. The Channel typically exhibits high volumes of water, and stronger indicia of contamination, during and after substantial rainfall.

This notice letter is based on publicly available information, on Property Owners' knowledge and observations, and on testing conducted by investigators retained by Property Owners and Kirkland. Additional information, including information in Kirkland's possession, and/or additional testing, may reveal additional violations.

To remedy these violations, we intend to ask that the court order Kirkland to pay civil penalties, as authorized by 33 U.S.C. § 1365, based on the factors set forth in 33 U.S.C. § 1319(d) and calculated in accordance with 40 C.F.R. § 19.4. Kirkland is liable for violations occurring each day before the date of this letter and for every day these violations continue. We will also seek declarative relief, confirming that Kirkland has violated and continues to violate the CWA. We will seek injunctive relief, 33 U.S.C. § 1365, that requires Kirkland to take all actions necessary to comply with the Permit and all other applicable CWA and Washington State requirements, prevent further water pollution at the stormwater system, and remediate any ongoing pollution and environmental harm caused by the stormwater system's illegal discharges. Lastly, we intend to seek the recovery of costs, including attorney fees, as authorized by, *inter alia*, the CWA, 33 U.S.C. § 1365(d).

Sincerely,

GOLDFARB & HUCK ROTH RIOJAS, PLLC



Kit W. Roth

Copy to:

Adam Rosenberg
Williams Kastner

Maia Bellon, Director
Washington Department of Ecology
300 Desmond Drive SE
PO Box 47600
Olympia, WA 98504-7600

Bob Ferguson, Attorney General
Washington State Office of the Attorney General
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100

Andrew Wheeler, Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Mail Code 1101A
Washington, DC 20460

Chris Hladick, Regional Administrator
Environmental Protection Agency, Region 10
Park Place Building
1200 Sixth Avenue
Seattle, WA 98101

William Barr, Attorney General
United States Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530-0001

EXHIBIT A

Property Owner Information

Kirk and Carol Mathewson

Home addresses: 746 2nd St. So., Kirkland, WA 98033

Mailing address: 10510 Northup Way, Suite 300, Kirkland, WA 98033

Home Phone: 206-369-5252

Work Phone: 425-250-0051

Property involved: King County Tax Parcel Nos. 3892100045; 0825059070; 0825059238

Thatcher Mathewson

Home addresses: 13132 NE 187th Pl., Woodinville, WA 98072

Mailing address: 10510 Northup Way, Suite 300, Kirkland, WA 98033

Home Phone: 425-830-4815

Work Phone: 425-250-0051

Property involved: King County Tax Parcel No. 0825059070

ANV, LLC

Mailing address: 920 5th Avenue, Suite 400, Seattle, WA 98104

Home Phone: 206-310-7670

Work Phone: 206-757-8890

Property involved: King County Tax Parcel No. 0192400060

Celane, LLC

Mailing address: 10510 Northup Way, Suite 300, Kirkland, WA 98033

Phone: 425-250-0051

Property involved: King County Tax Parcel No. 0192400080

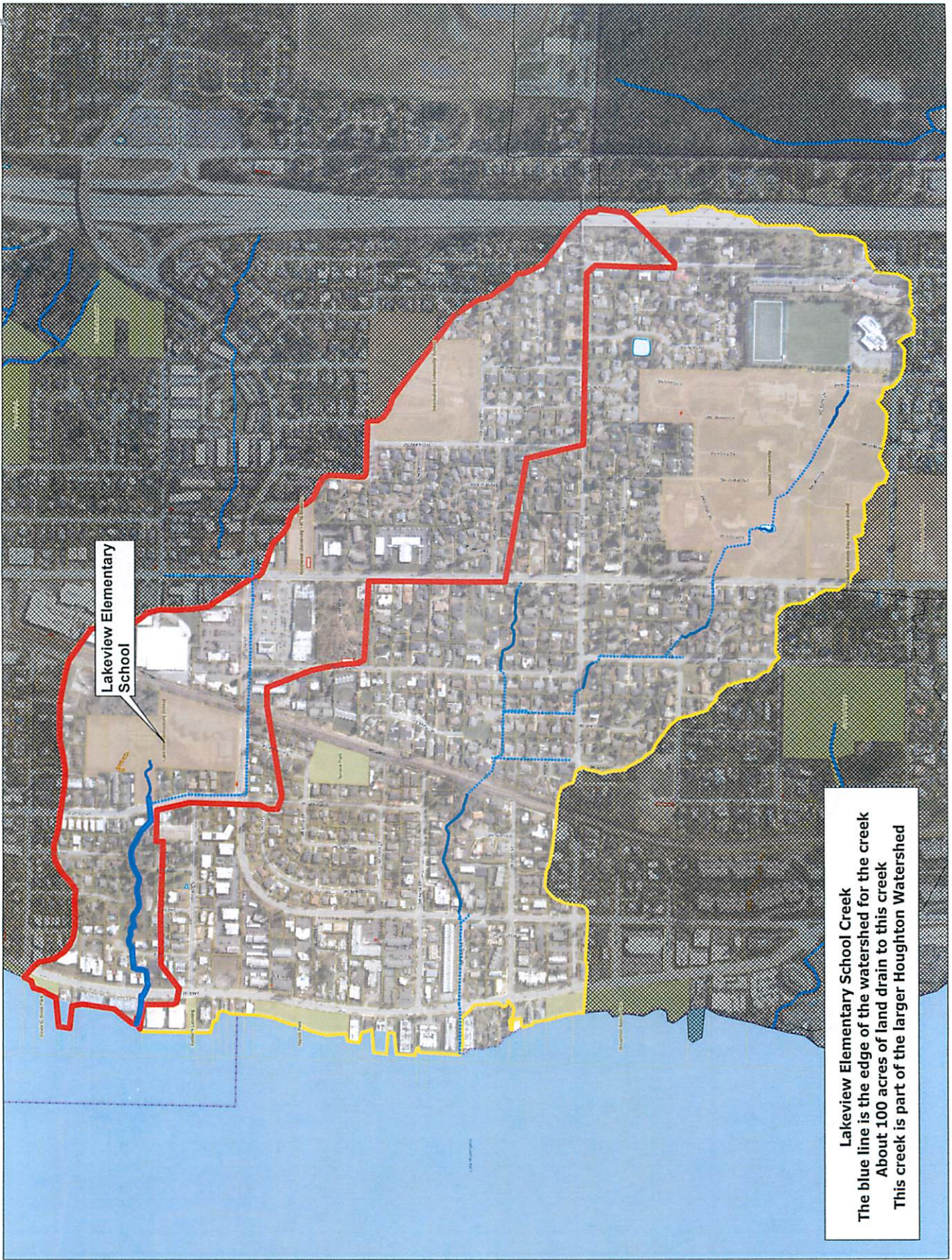
Tapps, LLC

Mailing address: 10510 Northup Way, Suite 300, Kirkland, WA 98033

Phone: 425-250-0051

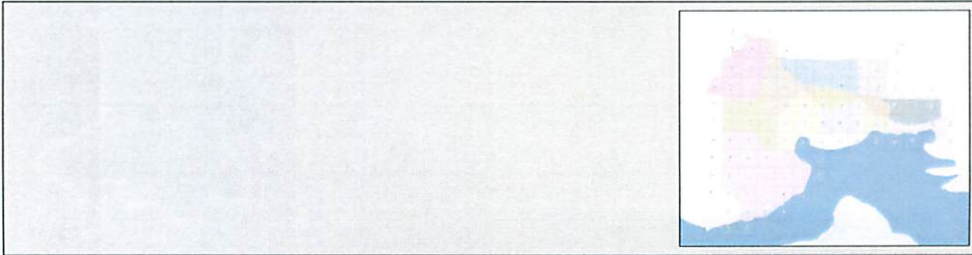
Property involved: King County Tax Parcel No. 0825059020

EXHIBIT B



Lakeview Elementary School

Lakeview Elementary School Creek
 The blue line is the edge of the watershed for the creek
 About 100 acres of land drain to this creek
 This creek is part of the larger Houghton Watershed



Prepared by: City of Houghton
 © 2013, The City of Houghton. All rights reserved.
 No warranties of any kind, including but not limited to
 accuracy, timeliness or completeness, are made by the
 author.
 Author: Kylene
 Editor: Kylene
 Date: 11/17/2013 1:45 PM

EXHIBIT C

**Lakeview Elementary School
Drainage**



Produced by the City of Kirkland
© 2012, the City of Kirkland, all rights reserved
No warranties of any sort, including but not limited to
accuracy, fitness or merchantability, accompany this product.

Author
Name: Lakeview Elementary
Date Saved: 4/12/2013 12:58:01 PM



Ryeann-Marie Tuomisto

From: Jenny Gaus
Sent: Monday, January 30, 2017 1:15 PM
To: Ryeann-Marie Tuomisto
Subject: Lakeview Creek Issue

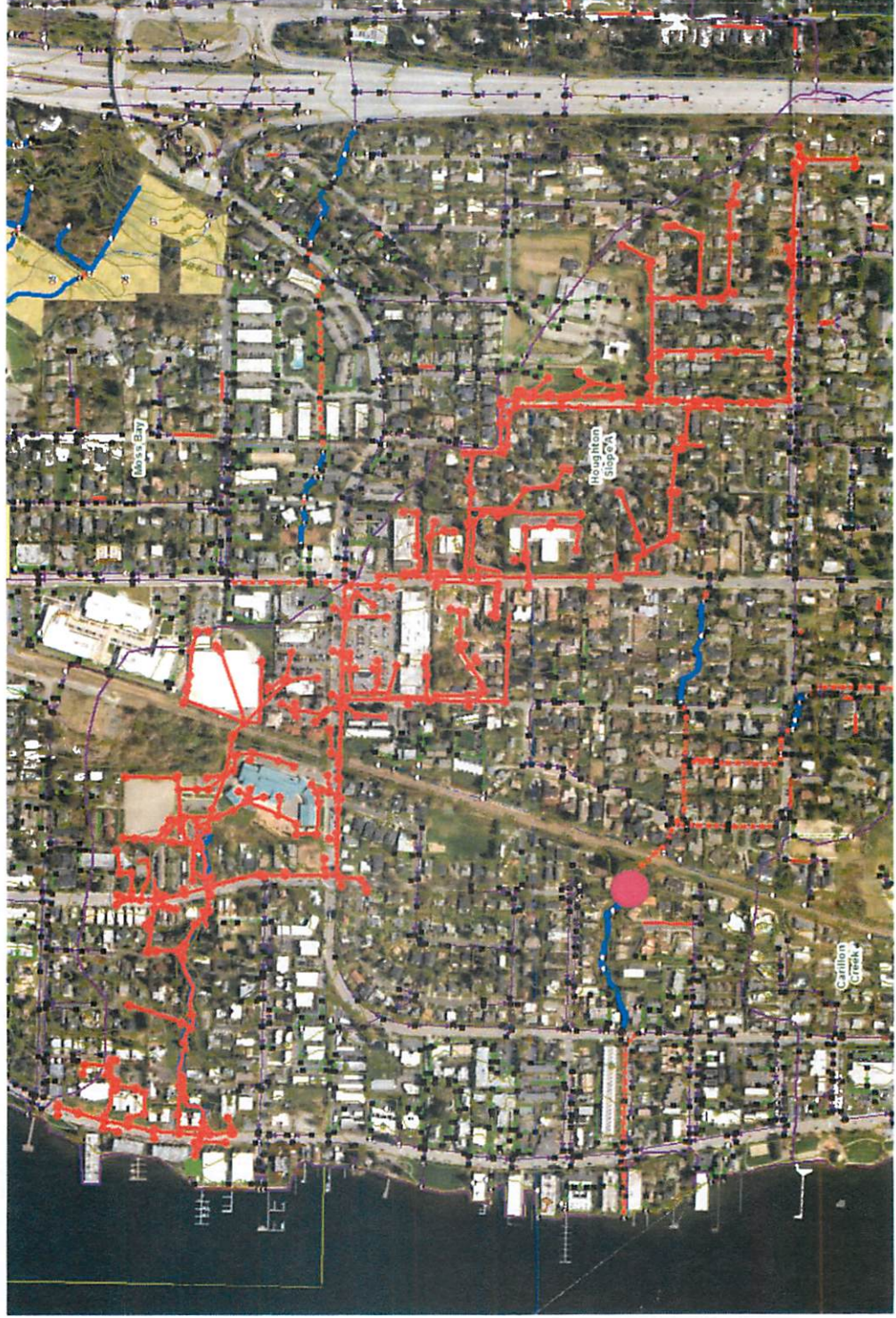


EXHIBIT D

Brian Ritchie

From: Jenny Gaus
Sent: Friday, June 16, 2017 8:39 AM
To: Kevin Raymond; Stephanie Croll
Cc: Ryeann-Marie Tuomisto
Subject: Mathewson property bacteria sampling

Hello Kevin –

Thanks to Ryeann for a great map and investigation summary – please let me know if you have additional questions.

Jenny

Raedeke and Associates conducted water quality sampling in the stream on the Mathewson property, and reported that a single very high bacteria count was found in a sample taken in September of 2016. The level reported for this sample (250,000 CFU/100ml) is indicative of raw sewage or other serious bacterial contamination. The City of Kirkland Water Quality Team was notified of this result in early 2017, and has conducted further sampling in the area surrounding the Mathewson property with the goal of determining whether there is a source of bacterial contamination that can be eliminated. This is standard City practice – it is part of compliance with the NPDES Stormwater Permit to identify and eliminate sources of stormwater pollution. Below is a summary of the investigation and sampling results.

The data collected to date show elevated bacteria concentrations that are related to rain events. While the levels are above State Water Quality Standards (geometric mean of < 50 CFU/100ml, with no samples greater than 100 CFU/100 ml), they are typical of levels seen in other Kirkland streams during rain events. Samples taken during dry periods show much lower levels than those seen during rain events. Further, DNA sampling showed relatively low levels of human fecal matter. Human DNA (Hu-2) levels in the 1000s are typically indicative of human contamination such as a sewer overflow or failing septic system – none of the observed values approach 1000. The City data collected to date do not indicate a particular point source, but rather point to the collection of sources such as geese, rodents, and pets that deposit fecal matter which is washed into the stormwater system and subsequently into streams during rain events. Although bacterial contamination can be hard to catch through grab-sampling (as opposed to continuous monitoring), the results to date do not indicate a sewage leak or overflow that would be of concern. For now, we will discontinue sampling of this watershed, unless Raedeke or others provide us with further data indicating a severe problem.

Below is a summary of the investigation (sampling results and map displayed below):

- On 2/21/2017, fecal coliform sampling occurred in the storm system above and below the Mathewson property. Results indicated that further upstream sampling should continue. Rain accumulation the five hours before sampling was minimal (0.02 inches).*
- On 3/10/2017, fecal coliform sampling occurred upstream in a storm structure (#6742) located on Lakeview Elementary. Samples were retrieved from two locations, surface water flowing from the retention system and from the surface stream flowing from the east. Results were negligible. There was no rain accumulation the five hours before sampling.*

- On 4/26/2017, fecal coliform sampling occurred again at same storm structure location (#6742), same two surface water flows, but added another flow, storm water flowing from the municipal storm system from State Street South. Results were higher than previous sampling results. It was noted that sampling at this time was directly after a rain storm, rain fall accumulation with the past five hours totaling 0.38 inches. From experience, higher fecal coliform results could be related to higher surface water flows, a flush of surface water washing off animal bacteria from surrounding areas. To confirm this suspicion, we decided to sample again but this time use a new analytical method, Hu-2-Bacteroidales, a human genetic marker to determine if human sewage is a source of pollution.
- On 5/17/2017, Hu-2-Bacteroidales and fecal coliform sampling was performed. Results showed the fecal coliform was lower than the 4/16/2017 sampling event. Rain accumulation was negligible. The Hu-2-Bacteroidales results showed low values, indicating that a human source of pollution is not likely. For reference, previous Hu-2-Bacteroidales results indicating human sewage pollution were in the 1000's.

Map Locations	Sample Location	2/21/2017 Fecal Coliform	3/10/2017 Fecal Coliform	4/26/2017 Fecal Coliform	5/17/2017 Fecal Coliform	5/17/2017 Hu-2- Bacteroidales
A	930 1st St S	320				
B	903 State St S	620				
C	Lakeview ret/det #6742		7	1300	110	79
D	Lakeview creek #6742		6	1400	390	270
E	Lakeview MS4			840	16	73
F	Lakeview outrall #18261				47	<1
	Rain Accumulation (inches)					
	5 hr before sample	0.02	0	0.38	0	
	24 hr before sample	0.22	0.43	0.4	0.04	
	3 days before sample	0.44	0.68	0.49	1.17	
	7 days before sample	2.77	1.47	0.99	1.73	

Am Test Inc.
13600 NE 126TH PL
Suite C
Kirkland, WA 98034
(425) 885-1664
www.amtestlab.com



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Analytical
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ANALYSIS REPORT

City of Kirkland
123 5th Ave
Kirkland, WA 98033
Attention: RYEAN-MARIE TUOMISTO
PO Number: 63929
All results reported on an as received basis.

Date Received: 02/21/17
Date Reported: 2/24/17

AMTEST Identification Number
Client Identification
Sampling Date

17-A002322
903 STATE ST S
02/21/17, 09:35

Above

Microbiological

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE / TIME
Fecal Coliform	620	CFU/100 ml		1	SM 9222D	NG	02/21/17 15:00
Escherichia coli	500	MPN/100mL		1	SM 9221F1	NG	02/21/17 15:00

AMTEST Identification Number
Client Identification
Sampling Date

17-A002323
930 1ST ST S
02/21/17, 09:50

Below

Microbiological

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE / TIME
Fecal Coliform	320	CFU/100 ml		1	SM 9222D	NG	02/21/17 15:00
Escherichia coli	320	MPN/100mL		1	SM 9221F1	NG	02/21/17 15:00

$$\begin{aligned} 2/21/17 &= 0.02'' \\ 5 \text{ hr} &= (2/20/17 - 2/21/17) = 0.22'' \\ 24 \text{ hr} &= (2/20/17 - 2/21/17) = 0.44'' \\ 3 \text{ days} &= (2/18/17 - 2/21/17) = 2.77'' \\ 7 \text{ days} &= (2/14/17 - 2/21/17) = 2.77'' \end{aligned}$$

Kathy Fugiel
President

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Kirkland, WA 98034
(425) 885-1664
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ANALYSIS REPORT

City of Kirkland
123 5th Ave
Kirkland, WA 98033
Attention: RYEAN-MARIE TUOMISTO
PO Number: 63929
All results reported on an as received basis.

Date Received: 03/10/17
Date Reported: 3/16/17

AMTEST Identification Number 17-A003373
Client Identification LV ELEM: RETEN
Sampling Date 03/10/17, 01:51

Microbiological

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE / TIME
Fecal Coliform	7.	CFU/100 ml		1	SM 9222D	NG	03/10/17 15:30
Escherichia coli	6.	MPN/100mL		1	SM 9221F1	JM	03/10/17 15:30

AMTEST Identification Number 17-A003374
Client Identification LV ELEM: CREEK
Sampling Date 03/10/17, 01:47

Microbiological

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE / TIME
Fecal Coliform	6.	CFU/100 ml		1	SM 9222D	NG	03/10/17 15:30
Escherichia coli	6.	MPN/100mL		1	SM 9221F1	JM	03/10/17 15:30

3/10/17
5 hr = 0.00"
24 hr = 3/9/17 - 3/10/17 = 0.43"
3 days = 3/7/17 - 3/10/17 = 0.68"
7 days = 3/3/17 - 3/10/17 = 1.47"

Kathy Fugiel
President

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Kirkland, WA 98034
(425) 885-1664
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ANALYSIS REPORT

City of Kirkland
123 5th Ave
Kirkland, WA 98033
Attention: RYEAN-MARIE TUOMISTO
Project Name: LAKEVIEW 4/26/17
PO Number: 63929
All results reported on an as received basis.

Date Received: 04/26/17
Date Reported: 5/1/17

AMTEST Identification Number 17-A006012
Client Identification LAKEVIEW DETENTION
Sampling Date 04/26/17, 03:08

Microbiological

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE / TIME
Fecal Coliform	1300	CFU/100 ml		1	SM 9222D	JM	04/26/17 16:00
Escherichia coli	1300	MPN/100mL		1	SM 9221F1	JM	04/26/17 16:00

AMTEST Identification Number 17-A006013
Client Identification LAKEVIEW-MS4
Sampling Date 04/26/17, 03:10

Microbiological

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE / TIME
Fecal Coliform	840	CFU/100 ml		1	SM 9222D	JM	04/26/17 16:00
Escherichia coli	590	MPN/100mL		1	SM 9221F1	JM	04/26/17 16:00

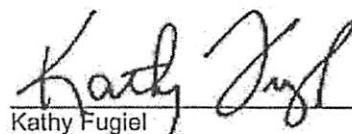
4/26/17
5hr = 0.38"
24hr = 4/25/17 - 4/26/17 = 0.4"
3days = 4/23/17 - 4/26/17 = 0.49"
7days = 4/19/17 - 4/26/17 = 0.99"

City of Kirkland
Project Name: LAKEVIEW 4/26/17
AmTest ID: 17-A006014

AMTEST Identification Number 17-A006014
Client Identification LAKEVIEW INFLOW
Sampling Date 04/26/17, 03:05

Microbiological

PARAMETER	RESULT	UNITS	Q	D.L.	METHOD	ANALYST	DATE / TIME
Fecal Coliform	1400	CFU/100 ml		1	SM 9222D	JM	04/26/17 16:00
Escherichia coli	1200	MPN/100mL		1	SM 9221F1	JM	04/26/17 16:00


Kathy Fugiel
President